

**Christopher D. Adams** Partner T. 973-639-2059

cadams@mccarter.com

Four Gateway Center 100 Mulberry Street Newark, NJ 07102-4056

McCarter & English, LLP

www.mccarter.com

September 9, 2024

## VIA ECF AND FEDEX

The Honorable James B. Clark, III, U.S.M.J. Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Room PO 01 Newark, New Jersey 07101

Re: Jane Doe v. John Smith, Civ. No. 2:24-cv-634-ES-JCB

Dear Judge Clark:

This firm represents Defendant John Smith ("Defendant") in connection with the above-referenced matter. We write in reference to the Court's Letter Order, (ECF no. 60), administratively terminating the motion to quash filed by Defendant on September 4, 2024. (ECF No. 59). The motion to quash was filed as a precautionary measure to prevent the production of documents sought by Plaintiff for production by September 15, 2024. These documents are highly prejudicial and confidential. While Defendant sought to meet and confer with Plaintiff on this issue prior to the filing of the motion to quash, Plaintiff's counsel was out of office between September 4, 2024 and September 6, 2024. Since then, Defendant's counsel confirmed with Plaintiff's counsel that this matter could not be resolved through a meet and confer and briefing is required.

Additionally, we would like to apprise the Court of a recent development in scheduling that has opened up for Defendant's counsel. A separate trial that Defendant's counsel was set to begin on September 16, 2024 has moved by a week. If it is amenable to the Court, Defendant can start the settlement conference scheduled for September 16, 2024 at any time that day and does not need to wait until 2:30 pm.

We thank Your Honor for Your attention to this matter.

Respectfully submitted,

/s/ Christopher D. Adams

Christopher D. Adams